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November 28, 2016

via electronic filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Submission for the Record
Transition from TTY to Real-Time Text Technology
CG Docket No. 16-145, GN Docket No. 15-178

Dear Ms. Dortch:

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI) and the undersigned organizations (collectively “Consumer Groups”) respectfully write to respond to recent filings in the above referenced dockets concerning the transition from TTY to Real-Time Text Technology (RTT), and to express our support for several specific requirements that are critical for a successful transition to RTT.

First, we strongly support the position of Rehabilitation Engineering Research Center on Technology for the Deaf and Hard of Hearing–Gallaudet University (RERC) and Omnitor that RTT must be supported on every phone that has a display and the ability to generate text or to connect to devices that will generate text.¹ This is essential to ensuring that people who rely on text, or a combination of voice and text, are able to call doctors, neighbors, businesses, and

¹ See RERC and Omnitor *ex parte*, Docket Nos. 16-145, 15-178 at 2 (Nov. 8, 2016).

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others with whom they need or wish to communicate, and not just those who have purchased special phones.

In addition, we agree with RERC and Omnitor that the control to add RTT to a call must be available alongside other in-call controls, and in all instances that such controls are presented to users.² All consumers should be able to readily add RTT to a call in the same way that they can mute a conversation or activate their phone's speakerphone. This is important not only for users with disabilities, but also for elderly users and mainstream users who need to communicate at times when their voice calls cannot be understood, including instances where either party is in a noisy environment. In order to ensure this ability, all users must be able to locate the RTT control in the first instance. The goals of this proceeding will be severely undermined if there is a setting that allows RTT control to be hidden.

We also agree with RERC and Omnitor that all incoming calls that include RTT must be accepted with RTT automatically enabled.³ Of course, a call receiver can refuse to answer any call, including one with RTT. However, we strongly urge the Commission not to enable call receivers to accept only the voice portion of a call but not the RTT portion. Such design would discriminate against the millions of users who need RTT as part of their call in order to communicate. As RERC and Omnitor further point out, a design that allows just RTT to be rejected would also lead to increased use of and reliance on relay services in order to make sure that calls are received.⁴

These key handset requirements are essential to ensuring that RTT is deployed in a way that will bring RTT into mainstream use for all consumers, and that RTT will reduce the growing demand for relay services.

Finally, as Consumer Groups have previously expressed, the integration of RTT into Telecommunications Relay Services ("TRS") is essential to RTT's accessibility and integration into the mainstream telecommunications ecosystem.⁵ To this end, we support the position of Hamilton Relay that relay providers should be included in the RTT ecosystem, with wireless carriers connecting to relay providers in RTT.⁶ With RTT-to-RTT connections between wireless carriers and relay providers, relay services should be able to transition to an all-RTT interface.

We appreciate the opportunity to share our support for these important points and look forward to working with the Commission and industry stakeholders throughout the PSTN to IP transition. Please do not hesitate to contact me if you have any questions regarding this filing.

² *Id.* at 2-3.

³ *Id.* at 3.

⁴ *Id.*

⁵ *See, e.g.,* Reply Comments of Consumer Groups, Docket Nos. 16-145, 15-178 at 2-3 (Jul. 25, 2016); *see also* Comments of RERC and Omnitor at 19 (Jul. 11, 2016).

⁶ *See* Hamilton Relay *ex parte*, Docket Nos. 16-145, 15-178 at 1 (Oct. 24, 2016).

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Respectfully submitted,

/s/

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